

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MING HOM, Individually and on Behalf of
All Others Similarly Situated,

Plaintiff,

v.

VALE S.A., MURILO PINTO DE OLIVEIRA
FERREIRA, AND LUCIANO SIANI PIRES,

Defendants.

No. 1:15-cv-09539-GHW

VALLI T. CHIN, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

VALE S.A., MURILO PINTO DE OLIVEIRA
FERREIRA, LUCIANO SIANI PIRES, and
PETER POPPINGA,

Defendants.

No. 1:16-cv-00658-GHW

**NOTICE OF MOTION OF THE ALAMEDA COUNTY EMPLOYEES' RETIREMENT
ASSOCIATION AND THE ORANGE COUNTY EMPLOYEES RETIREMENT SYSTEM
FOR APPOINTMENT AS LEAD PLAINTIFF, APPROVAL OF THEIR SELECTION OF
LEAD COUNSEL, AND CONSOLIDATION OF RELATED ACTIONS**

PLEASE TAKE NOTICE that on a date and at a time designated by the Court, before the Honorable Gregory H. Woods, at the United States District Court for the Southern District of New York, located at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Courtroom 12C, New York, New York, the Alameda County Employees' Retirement Association ("ACERA") and the Orange County Employees Retirement System ("OCERS") will respectfully move this Court for entry of an Order, pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995 (the "PSLRA"): (1) appointing ACERA and OCERS as Lead Plaintiff in the above-captioned actions; (2) approving ACERA's and OCERS's selection of Bernstein Litowitz Berger & Grossmann LLP ("Bernstein Litowitz") to serve as Lead Counsel for the Class; (3) consolidating all related actions; and (4) for any such further relief as the Court may deem just and proper.

This Motion is made on the grounds that ACERA and OCERS believe they are the "most adequate plaintiff" under the PSLRA and should therefore be appointed Lead Plaintiff. Specifically, ACERA and OCERS believe that they have the "largest financial interest" in the relief sought by the Class in this action by virtue of, among other things, the over \$15 million in losses that they suffered on their investments in Vale S.A. common and preferred stock ADRs. ACERA and OCERS also otherwise satisfy the requirements of Rule 23 of the Federal Rules of Civil Procedure because their claims are typical of other Class members' claims and because they will fairly and adequately represent the interests of the Class. Moreover, ACERA and OCERS are paradigmatic Lead Plaintiffs under the PSLRA because they are sophisticated institutional investors with a substantial financial stake in the litigation, which guarantees effective monitoring and supervision of counsel.

ACERA and OCERS respectfully request oral argument.

This Motion is based upon this Notice of Motion, the accompanying Memorandum of Law in support thereof, the Declaration of Blair A. Nicholas filed herewith, the pleadings and other filings herein, and such other written or oral argument as may be permitted by the Court.

WHEREFORE, ACERA and OCERS respectfully request that the Court: (1) appoint ACERA and OCERS as Lead Plaintiff in the above-captioned actions pursuant to the PSLRA; (2) approve ACERA's and OCERS's selection of Bernstein Litowitz to serve as Lead Counsel for the Class; (3) consolidate all related actions; and (4) grant such further relief as the Court may deem just and proper.

Dated: February 5, 2016

Respectfully Submitted,

/s/ Gerald H. Silk

Gerald H. Silk

Avi Josefson

**BERNSTEIN LITOWITZ BERGER
& GROSSMANN LLP**

1251 Avenue of the Americas

New York, New York 10020

Telephone: (212) 554-1400

Facsimile: (212) 554-1444

jerry@blbglaw.com

avi@blbglaw.com

-and-

Blair A. Nicholas (*Pro hac vice application
forthcoming*)

Timothy DeLange (*Pro hac vice application
forthcoming*)

12481 High Bluff Drive, Suite 300

San Diego, California 92130

Telephone: (858) 793-0070

Facsimile: (858) 793-0323

blairn@blbglaw.com

timothyd@blbglaw.com

*Counsel for Proposed Lead Plaintiffs
Alameda County Employees' Retirement*

*Association and Orange County Employees
Retirement System and Proposed Lead
Counsel for the Class*